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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LINDSAY SANTINI, on behalf of herself and
others similarly situated,

Plaintiff,

v.

WELLS FARGO BANK, a National
Association with its principal place of business
in the State of California,

Defendant.

Case No.: 16-cv-01992-YGR

CLASS ACTION

Honorable Yvonne Gonzalez Rogers

Action Filed: April 15, 2016

**NOTICE OF FILING OF "NOTICE OF
RELATED CASES" IN *WELLS FARGO
WAGE AND HOUR CASES*, JCCP 4821,
CURRENTLY PENDING IN THE
ALAMEDA COUNTY SUPERIOR
COURT, PURSUANT TO CALIFORNIA
RULES OF COURT, RULE 3.300(d)**

Trial Date: None Set

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1 **PLEASE TAKE NOTICE THAT** a Notice of Related Cases ("Notice") has been filed by
2 plaintiffs in the *Wells Fargo Wage and Hour Cases*, Superior Court for the State of California,
3 County of Alameda Case No. JCCP 4821, pursuant to California Rules of Court ("CRC"), Rule
4 3.300. As required by Rule 3.300(b), the Notice lists the case pending before this Court, as the
5 cases involve the same or similar claims and parties (*see* CRC 3.300(a)(1)). A true and correct
6 copy of said Notice is attached hereto as **Exhibit A**.

8 Dated: June 23, 2016

THE MARKHAM LAW FIRM

By: 

David R. Markham

Peggy J. Reali

Attorneys for *Santini* plaintiff and *Ramirez*
plaintiffs in JCCP No. 4821

EXHIBIT A

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF ALAMEDA

Coordination Proceeding)	Case No. JCCP004821
Special Title (Rule 3.550))	
WELLS FARGO WAGE AND HOUR CASES)	Assigned to Hon. George C. Hernandez, Jr.
)	Department 17
<i>Ramirez et al. v. Wells Fargo Bank, Alameda</i>)	Case Filed: January 28, 2010
County, No. RG10496146,)	Trial Date: None set
)	
<i>Richard v. Wells Fargo Bank, Alameda County,</i>)	NOTICE OF RELATED CASES
No. RG13690969, and)	[California Rules of Court, Rule 3.300]
)	
<i>Hanesoghlyan et al. v. Wells Fargo Bank, Los</i>)	
Angeles County, No. BC470634)	

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1 Plaintiffs in this coordinated action, Bernadette Richard, Michael Devito, Yvette Ramirez,
 2 Henry Maroquin, Jeremy Uzqueda, Ani Hanesoghlyan, Maria Teresa Arguelles, and Kimia Arya,
 3 hereby notify the Court, pursuant to California Rules of Court, Rule 3.300(b), of the following
 4 similar cases pending in other courts:

5 1. *Wells Fargo Bank Wage and Hour Cases*, JCCP 4702, consists of two cases which were
 6 coordinated in Los Angeles Superior Court on January 31, 2012, before the Honorable
 7 Kenneth R. Freeman, located at 600 South Commonwealth Avenue, Los Angeles, CA
 8 90005, in Dept. 310:

9 a. *Daniel et al. v. Wells Fargo Bank* filed on January 12, 2011 in Los Angeles Superior
 10 Court, Case No. BC452909

11 b. *Alexander v. Wells Fargo, N.A.* filed on August 8, 2011 in Alameda County
 12 Superior Court, Case No. RG11589524.

13 These coordinated cases are brought on behalf of current and former Wells Fargo non-
 14 exempt Tellers, and allege a single cause of action under the Private Attorney General Act,
 15 California Civil Code §2699, *et seq.* ("PAGA") for unpaid wages, off-the-clock work, and unpaid
 16 overtime.

17 2. *Carroll v. Wells Fargo* filed in San Francisco Superior Court on April 7, 2015. The case
 18 was subsequently removed to the United States District Court, Northern District of
 19 California, San Francisco Division, Case No. 15-CV-02321-EMC and is assigned to the
 20 Honorable Edward M. Chen in Courtroom 5. The courthouse is located at 450 Golden
 21 Gate Avenue, San Francisco, CA 94102.

22 *Carroll* is a class action brought on behalf of all non-exempt employees of Wells Fargo
 23 (although the one named Plaintiff held the non-exempt position of Service Manager I), and alleges
 24 California law violations of failure to pay minimum/straight time/overtime wages; violation of
 25

1 California Business and Professions Code § 17200 *et seq.*; failure to pay for breaks of less than 30
 2 minutes in duration - California law predicated on FLSA/regulations; meal break violations; rest
 3 break violations; waiting time penalties; and failure to provide accurate itemized wage statements.

4 3. *Layog v. Wells Fargo*, United States District Court, Northern District of California,
 5 Case No. 3:16-cv-02011-JD, filed April 15, 2016. The case is assigned to the Honorable
 6 James Donato of the San Francisco Division, located at 450 Golden Gate Avenue, San
 7 Francisco, CA 94102, Courtroom 11.

8 This is a class action brought on behalf of non-exempt Tellers, and alleges failure to pay
 9 overtime under FLSA; and under California law, failure to pay wages and overtime, meal and rest
 10 break violations; failure to provide accurate itemized wage statements; failure to pay all wages due
 11 twice monthly; failure to pay wages upon termination of employment; and violation of California
 12 Business and Professions Code § 17200 *et seq.*

13 4. *Santini v. Wells Fargo*, United States District Court, Northern District of California,
 14 Case No. 4:16-cv-01992-YGR, filed April 15, 2016. The case is assigned to the
 15 Honorable Yvonne Gonzalez Rogers of the Oakland Division, located at 1301 Clay
 16 Street, Oakland, CA 94612, in Courtroom 1.

17 *Santini* is a class action brought on behalf of Wells Fargo non-exempt Call Center
 18 employees, alleging California law violations for failure to pay wages and overtime; meal and rest
 19 break violations; failure to provide accurate itemized wage statements; failure to pay wages upon
 20 termination of employment; and violation of California Business and Professions Code § 17200 *et*
 21 *seq.*

22 Earliest Filed Case. The earliest filed case is *Ramirez v. Wells Fargo, N.A.*, one of the cases
 23 coordinated before this Court in JCCP 4821, and originally filed as a class action on January 28,
 24 2010 on behalf of Wells Fargo non-exempt Customer Service and Sales Representatives (CSSRs)

1 and Bankers. Now that *Ramirez* is coordinated with the *Richard* and *Hanesoghlyan* actions, this
 2 coordinated action continues as a proposed class action, and is brought on behalf of Wells Fargo
 3 non-exempt CSSRs, Business Specialty Bankers, Personal Bankers, and Premier Bankers. The
 4 Second Amended Consolidated Class Action Complaint in this Coordinated Action alleges
 5 California law violations for failure to pay wages owed and overtime; meal and rest breaks
 6 violations; failure to timely pay wages due and to provide accurate itemized wage statements; and
 7 violations of California Business and Professions Code § 17200 *et seq.*

8
 9 Other than the *Ramirez*, *Richard* and *Hanesoghlyan* cases coordinated before this Court, the
 10 earliest filed case is *Daniel et al. v. Wells Fargo Bank* filed on January 12, 2011 in Los Angeles
 11 Superior Court, Case No. BC452909, currently coordinated in JCCP 4702 in the Los Angeles
 12 Superior Court.

13
 14 Summary. These cases involve the same defendant (Wells Fargo Bank), and are based on
 15 the same or similar claims of wage and hour violations under California and/or the FLSA.
 16 Specifically, these cases are proposed class and/or representative actions brought by current and
 17 former non-exempt employees of Wells Fargo who seek unpaid wages stemming from off-the-
 18 clock work and missed meal and rest breaks, along with the related California law penalties.

19 Respectfully Submitted,

20
 21 Dated: June 23, 2016

22 THE MARKHAM LAW FIRM

23 By: 

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 25 Peggy J. Reali

26 Attorneys for Plaintiffs Yvette Ramirez, Henry
 27 Marroquin, and Jeremy Uzqueda; and all
 28 coordinated Plaintiffs